

FILED

CLERK, U.S. DISTRICT COURT

9/29/24

CENTRAL DISTRICT OF CALIFORNIA

BY: CS DEPUTY

1 JAQUAN RAMDHAN
2 1920 HILLHURST AVENUE # 1360
3 LOS ANGELES, CALIFORNIA 90027
4 PHONE: (805) 600-1099
5 EMAIL: CHANTEL BONET@GMAIL.COM

6 JAQUAN RAMDHAN, PRO SE

7 UNITED STATES DISTRICT COURT

8 CENTRAL DISTRICT OF CALIFORNIA

9 CV24-8471-MCS(SKx)

10 JAQUAN RAMDHAN,
11 PLAINTIFF,

12 VS.

13 AMAZON.COM, INC.
14 DEFENDANT,

No.

COMPLAINT FOR DAMAGES PURSUANT
TO TITLE I OF THE AMERICANS WITH
DISABILITIES ACT (ADA) OF 1990 42 USC
SECTION 12112(a),

COMPLAINT FOR DAMAGES OF
VIOLATION OF TITLE VII OF THE CIVIL
RIGHTS ACT OF 1964 HARASSMENT IN
THE WORKPLACE DISCRIMINATION
BASED ON DISABILITY AND WRONGFUL
TERMINATION

DEMAND FOR JURY TRIAL

19 I. JURISDICTION

- 20 1. This court has jurisdiction under 28 U.S.C. 1331. Federal question jurisdiction arises
21 pursuant to Title I of the Americans with Disabilities Act (ADA) of 1990 42 U.S.C.
22 Section 12112(a). This law protects people with disabilities from discrimination in the
23 workplace. Title VII of The Civil Rights Act of 1964 protects individual from harassment
24 in the workplace.

25 II. VENUE

- 26 2. Venue is proper pursuant to 28 U.S.C 1391 because the events giving rise to this complaint
27 happened in this district.
28

III. PARTIES

3. Plaintiff, Jaquan Ramdhan, date of birth 09/03/2002, age 22 years old. Plaintiff resides at 1920 Hillhurst Avenue, Unit 1360, Los Angeles, California 90064. Jaquan Ramdhan was employed with Amazon. Com from October 2022 until December 2023, 14 months.
4. Defendant, Amazon.Com Inc. is an online company that sells a wide range of products and services. Amazon.Com Inc is located at 410 Terry Avenue N, Seattle, WA 98109. Amaon.Com, Inc. a corporation organized and existing under the general corporation law of the State of Delaware. As of 2024, Amazon.Com Inc. has 1,532,000 employees.

IV. STATEMENT OF FACT

5. Plaintiff was discriminated against based on Plaintiff's disability medical condition which is called Vestibular Balance Disorder. Under federal law the Social Security Administration recognizes Vestibular Balance Disorder as a disability. The Americans with Disabilities Act (ADA) Title I, of 1990, protects qualified people with disabilities from employment discrimination.
6. Immediately after being hired on 10/01/22. Plaintiff disclosed information to Defendant's management employees. The fact that Plaintiff had been diagnosed with several medical disabilities, epileptic seizures, asthma, migraine headaches and Vestibular Balance Disorder which affects a person's balance and causes disorientation, brief dizziness, when moving a person's head in a certain position, causes lightheadedness, unsteadiness, or a feeling of spinning and floating or moving.
7. From the age of five until age seventeen. Plaintiff was enrolled in a federally funded program in public-school. This program was covered by a federal law called Section 504 of the Rehabilitation Act of 1973. This federal law protects the rights of a child that has disabling medical conditions. A disability that limits a major life function. such as, walking, seeing, hearing, speaking, breathing, working or performing major tasks. Plaintiff qualified for federal programs for twelve years as a minor child due Plaintiff's disabling chronic medical conditions.
8. For October 2022 through December 2023, for fourteen months. Plaintiff endured egregious

1 harassment from Defendant's management employee, Anthony Torres. Harassment that was
2 inappropriate, unprofessional, aggressive and intimidating. Plaintiff endured petty allegations
3 of stealing cheap merchandise such as ink pens, packs of 99 cent line paper. Plaintiff has
4 been falsely accused by Anthony Torres of stealing cheap merchandise under five dollars.
5 The false allegations were not substantiated. There was no proof, no evidence to validate
6 Anthony Torres, consistent false allegations. The false allegations persisted for fourteen
7 months. Alleging Plaintiff stole cheap merchandise. Anthony Torres was never able to
8 present any tangible evidence. Never presented any video tapes. Never presented any
9 witnesses to prove Anthony Torres, false allegations. The false allegations against Plaintiff
10 were solely based on Anthony Torres suspicion alone. Anthony Torres would physically
11 follow Plaintiff around the workplace warehouse. Anthony Torres, accusations of theft were
12 non-stop, consistent false allegations against Plaintiff without proof. Anthony Torres would
13 consistently watch Plaintiff during Plaintiff's eight hours work shift. From October 2022
14 through December 2023 Anthony Torres never presented any proof of Plaintiff being a
15 disloyal employee. Anthony Torres' consistent harassment caused Plaintiff to become
16 severely depressed. Plaintiff began to suffer with severe migraine headaches for a period of
17 fourteen months. Plaintiff dreaded coming to work at Defendant's place of employment.
18 Plaintiff knew the nightmare of eight hours of egregious harassment would be depressing at
19 work. Plaintiff endured the egregious harassment to make an honest living.

- 20 9. On 12/06/24, Wendy Defendant's Human Resources Manager approached Plaintiff at work.
21 While Plaintiff was loading boxes in Defendants truck to be shipped. Wendy stated that she
22 had an urgent matter that she needed to discuss with Plaintiff. Wendy said, "Let's go have a
23 conversation at the Human Resources area." Plaintiff followed Wendy. Wendy said
24 "Have a seat." Wendy advised Plaintiff to watch a video tape of Plaintiff from the day
25 before." Plaintiff said, "I watched the video tape, what are you trying to tell me?" Wendy
26 said, "You were trying to fake a fall." Plaintiff responded by saying, "What do you mean? I
27 was not trying to fake a fall on the floor of the warehouse." Plaintiff said, "I did not fall in
28 that video, so what is the problem." Wendy said, "We are going to have to let you go."

1 Plaintiff said, "I am terminated because, I almost slipped, I caught myself and I avoided a fall,
 2 what do you mean I faked a fall? I did not try to fall, that is why, I grabbed the cart, to avoid
 3 from falling" Plaintiff said, "Can I please obtain a copy of that video, because that video
 4 shows proof that I did not fall." Wendy said, "No you may not have a copy of this video, you
 5 are terminated, you must leave." Plaintiff further stated, "I cannot believe this. I grabbed the
 6 work cart with my hands to prevent myself from falling, you are saying I faked a fall, this is
 7 unbelievable, this is wrongful termination." Plaintiff left Defendant's warehouse on 12/06/23.

8 10. On 12/06/24, Plaintiff was wrongfully terminated due to Plaintiff's disability medical
 9 condition called Vestibular Balance Disorder. Plaintiff lost his balance at work and grabbed
 10 the employer's cart to prevent Plaintiff from falling. Plaintiff was wrongfully terminated for
 11 preventing a fall. The Defendant's management employee, Wendy falsely accused Plaintiff
 12 of faking a fall by. Realistically, Plaintiff did not actually fall. Plaintiff avoided the fall.

13 11. Plaintiff has exhausted his administrative remedies by filing a complaint with the
 14 United States Equal Employment Opportunity Commission the Right to Sue letter is
 15 dated 7/04/24. Review (Exhibit A). Plaintiff filed a complaint the State of California
 16 Civil Rights Department. The Right to Sue Letter is dated 07/10/24. Review (Exhibit B).

17 V. FIRST CAUSE OF ACTION

18 12. The Federal Law Title I of the Americans with Disability Act of 1990, protects people with
 19 disabilities from discrimination in the workplace. Title I, of the Americans with Disability
 20 Act states, "A physical or mental disabilities in no way diminish a person's right to fully
 21 participate in all aspects of society. Many people with physical disabilities have been
 22 precluded from doing so because of discrimination.

23 VI. SECOND CAUSE OF ACTION

24 13. The Defendant violated Plaintiff's civil rights according to the Federal Law Title VII of the
 25 Civil Rights Act of 1964, prohibiting discrimination in the workplace based on disability.
 26 The Defendant wrongfully terminated Plaintiff. Based on the fact, Plaintiff lost his balance
 27 and held on to the Defendant's work cart. Plaintiff prevented a fall. Plaintiff was terminated
 28 because of the Vestibular Balance Disorder. Under federal law unlawful workplace

1 harassment is defined by three key factors. On the conduct must be unwelcome. Plaintiff
2 being accused of stealing cheap merchandise. Which was never proven the harassment
3 Plaintiff endured was unwelcomed. The actions by Defendant's Management employee,
4 Anthony Torres and Wendy from Defendants Human Resources Department were severe and
5 pervasive. This form of harassment did interfere with Plaintiff work performance. Plaintiff
6 was consistently depressed for fourteen months.

7 VII. REQUEST FOR RELIEF

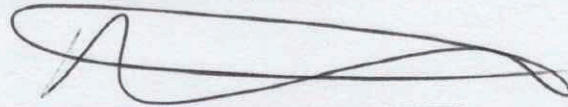
8 WHEREFORE, the Plaintiff requests:

- 9 14. Compensatory damages for lost wages, vehicle repossessed, evicted from rental, currently
10 homeless, pain and suffering, emotional distress, suffering loss of enjoyment of life, including
11 general and special damages, punitive damages for wrongful termination and discrimination
12 based on disability, Plaintiff request job back, damages according to proof. Plaintiff request
13 damages in the amount of one million dollar \$1,000,000.

14 VIII. DEMAND FOR JURY TRIAL

- 15 15. Plaintiff hereby requests a jury trial on all issues raised in this complaint.

16 Dated: September 21, 2024

17 

18 Jaquan Ramdhan

19 Plaintiff in Pro Se
20
21
22
23
24
25
26
27
28

EXHIBIT A



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Seattle Field Office
909 First Avenue, Suite 400
Seattle, WA 98104
(206) 576-3000
Website: www.eeoc.gov

DISMISSAL AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 07/04/2024

To: Mr. Jaquan Ramdhan
1920 Hillhurst Avenue # 1360
Los Angeles, CA 90027
Charge No: 551-2024-05392

EEOC Representative and email: Gustavo Irizarry
Intake Supervisor
gustavo.irizarry@eeoc.gov

DISMISSAL OF CHARGE

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

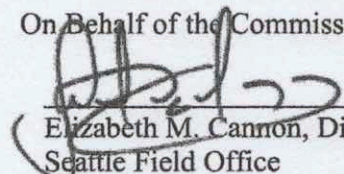
NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On Behalf of the Commission:

July 4, 2024
Date


for
Elizabeth M. Cannon, Director
Seattle Field Office

cc:
amazon.com; amazon@littler.com

Please retain this notice for your records.

EXHIBIT B



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GAVIN NEWSOM, GOVERNOR

KEVIN KISH, DIRECTOR

Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

July 10, 2024

Jaquan Ramdham
1920 Hillhurst Ave. #1360
Los Angeles, CA 90027

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202407-25375210
Right to Sue: Ramdham / Amazon

Dear Jaquan Ramdham:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective July 10, 2024 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department